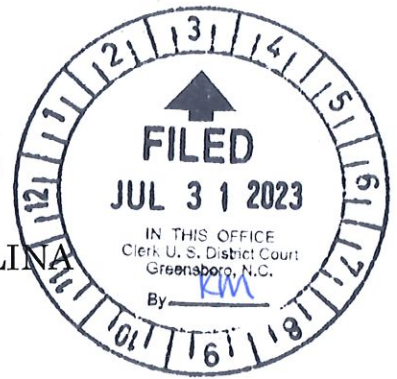


IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :
 :
 :
 v. :
 :
 :
 JAROD GABRIEL SEEMUNGAL : 1:23CR 260 -1
 REMY RA ST FELIX : 1:23CR 260 -2
 ELMER RUBEN CASTRO : 1:23CR 260 -3

The Grand Jury charges:

COUNT ONE

1. From in or about December 2022, continuing up to and including on or about July 27, 2023, the exact dates to the Grand Jurors unknown, in the County of Durham, in the Middle District of North Carolina, and elsewhere, JAROD GABRIEL SEEMUNGAL, REMY RA ST FELIX, and ELMER RUBEN CASTRO did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree with each other, and with other persons known and unknown to the Grand Jurors, to unlawfully seize, confine, kidnap, abduct, and carry away, and hold for ransom and reward and benefit any person, and travel in interstate commerce and use means, facilities, and instrumentalities of interstate and foreign commerce in committing and in furtherance of the commission of the offense.

2. In furtherance of the conspiracy and to effect the objects of the conspiracy, the following overt acts, among others, were committed in the Middle District of North Carolina and elsewhere:

a. On or about April 8, 2023, REMY RA ST FELIX and ELMER RUBEN CASTRO traveled from Florida to Durham, North Carolina.

b. On or before April 10, 2023, ELMER RUBEN CASTRO recorded the license plate of Victim-1's car.

c. On April 11, 2023, ELMER RUBEN CASTRO, accompanied by REMY RA ST FELIX, purchased a clipboard, reflective safety vest, sunglasses, and one pair of khaki pants at a Walmart in Durham, North Carolina.

d. Between April 8, 2023, and April 12, 2023, REMY RA ST FELIX and ELMER RUBEN CASTRO surveilled the residence of Victim-1 and Victim-2.

e. On or before April 12, 2023, REMY RA ST FELIX obtained an image of Victim-1's driver's license.

f. On April 12, 2023, REMY RA ST FELIX and ELMER RUBEN CASTRO kidnapped Victim-1 and Victim-2, forced Victim-1 to log into his computer and cryptocurrency exchange account, and transferred funds from Victim-1's cryptocurrency exchange account.

All in violation of Title 18, United States Code, Section 1201(c).

COUNT TWO

On or about April 12, 2023, in the County of Durham, in the Middle District of North Carolina, JAROD GABRIEL SEEMUNGAL, REMY RA ST FELIX, and ELMER RUBEN CASTRO did unlawfully seize, confine, kidnap, abduct, and carry away, and hold for ransom and reward and benefit, Victim-1 and Victim-2, and did travel in interstate commerce and use means, facilities, and instrumentalities of interstate and foreign commerce in committing and in furtherance of the commission of the offense, in violation of Title 18, United States Code, Sections 1201(a)(1) and 2.

DATED: July 31, 2023

SANDRA J. HAIRSTON
United States Attorney



BY: ERIC L. IVERSON
Assistant United States Attorney

A TRUE BILL:


FOREPERSON ✓